

RECEIVED

MAR 26 2001

PALMER BIEZUP & HENDERSON LLP

COUNSELORS AT LAW

NEW JERSEY
 200 NORTH FIFTH STREET
 CAMDEN, NEW JERSEY 08102-1204
 856 428 7717
 FAX 856 338 1008

956 PUBLIC LEDGER BUILDING
INDEPENDENCE MALL WEST
620 CHESTNUT STREET
PHILADELPHIA, PENNSYLVANIA 19106-3409

STEPHEN M. CALDER
 PARTNER
 scalder@pbh.com
 DIRECT DIAL: 215-625-7805

215 625 9900
 FAX: 215 625 0185
 pbhl@pbh.com

JUDGE WILLIAM M. NICKERSON
 NEW YORK
 140 BROADWAY, 46TH FLOOR PMB 46030
 NEW YORK, NEW YORK 10005
 212 406 1855
 FAX 212 858 7651

DELAWARE
 1223 FOULK ROAD
 WILMINGTON, DELAWARE 19803
 302 594 0895
 FAX 302 478 7625

March 22, 2001

BY OVERNIGHT COURIER

The Honorable William M. Nickerson
 United States District Court
 101 West Lombard Street
 Baltimore, MD 21201

Re: In re O.C. Rocket LLC
 U.S.D.C., District of Maryland
 Civil Action No.: WMN 00-2892
Our File No. 9465-077

Dear Judge Nickerson:

Subsequent to the issuance of the Court's Scheduling Order dated January 24, 2001, the parties have encountered a number of difficulties in regard to discovery. Among other things, certain employees of Petitioner O.C. Rocket are seasonal workers who will not be available until later this Spring, and medical records and depositions must be obtained from plaintiffs' medical providers located in New York. In addition, the existing schedule calls for Petitioner to be the first party to provide expert disclosures, and the parties agree that the schedule should be modified so that Claimants will first provide expert disclosures and reports, after having sufficient time to obtain the necessary documents and deposition testimony.

For these reasons, the parties have conferred and respectfully submit this joint request that the Court enter a Revised Scheduling Order, as follows:

| | |
|---|--------------------|
| Rule 26(e)(2) supplementation of disclosures and responses | July 15, 2001 |
| Discovery deadline | July 31, 2001 |
| Request for Admissions | August 7, 2001 |
| Claimants' expert reports | August 31, 2001 |
| Petitioner's expert reports and submission of status report | September 28, 2001 |
| Dispositive motions | October 15, 2001 |

" APPROVED " THIS 26 DAY
 OF March, 2001
Wm. M. Calder
 UNITED STATES DISTRICT JUDGE

PALMER BIEZUP & HENDERSON LLP

The Honorable William M. Nickerson
March 22, 2001
Page 2

We apologize for troubling the Court with these matters, but the parties believe this proposed schedule will reasonably enable them to fulfill their respective discovery obligations within the least amount of time.

Respectfully yours,

PALMER BIEZUP & HENDERSON

By: 
Stephen M. Calder

SMC/sp

cc: David Skeen, Esq.
Matt R. Ballenger, Esq.